

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL  
ENTERTAINMENT INC., *et al.*,<sup>1</sup>

Debtors.

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GEORGE L. MILLER, CHAPTER 7 TRUSTEE,

Plaintiff,

v.

WILLIAM J. ROUHANA, JR., AMY L. NEWMARK,  
CHRISTOPHER MITCHELL, FRED M. COHEN,  
COSMO DENICOLA, MARTIN POMPADUR,  
CHRISTINA WEISS LURIE, DIANA WILKIN,  
VIKRAM SOMAYA, JASON MEIER, AMANDA R.  
EDWARDS, CHICKEN SOUP FOR THE SOUL  
PRODUCTIONS, LLC, CHICKEN SOUP FOR THE  
SOUL, LLC, CHICKEN SOUP FOR THE SOUL  
HOLDINGS, LLC,

Defendants.

Chapter 7

Case No. 24-11442 (MFW)

(Jointly Administered)

Adv. Pro. No. 25-50399 (MFW)

**Re: Docket Nos. 31, 33, 34, 35, 36, 37, 38, 39  
40, 41, 42, 43, 44, 45 46, 47, 51, 52, 55, 56,  
57, 58, 59, 60, 61, 62, 64 & 65**

**CHICKEN SOUP FOR THE SOUL PRODUCTIONS, LLC, CHICKEN SOUP FOR  
THE SOUL, LLC, CHICKEN SOUP FOR THE SOUL HOLDINGS LLC, WILLIAM J.  
ROUHANA, JR., AMY L. NEWMARK, CHRISTOPHER MITCHELL, AMANDA R.  
EDWARDS, JASON MEIER AND THE INDEPENDENT DIRECTORS  
NOTICE OF COMPLETION OF BRIEFING**

**PLEASE TAKE NOTICE** that briefing is complete on Chicken Soup for the Soul Productions, LLC (“CSSP”), Chicken Soup for the Soul, LLC (“CSS”), and Chicken Soup for the Soul Holdings, LLC (“CSS Holdings”) (CSS, CSSP and CSS Holding are collectively referred to as the “CSS Entities”), William J. Rouhana, Jr., (“Mr. Rouhana”), Amy L. Newmark (“Ms. Newmark”), the “Independent Directors” (individually, Fred M. Cohen, Cosmo DeNicola,

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprises LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508).

Christina Weiss Lurie, Martin Pompadur, Vikram Somaya, and Diana Wilkin), Christopher Mitchell (“Mr. Mitchell”), Amanda R. Edwards (“Ms. Edwards”) and Jason Meier (“Mr. Meier”), (Mr. Meier, Ms. Edwards, Mr. Mitchell, the Independent Directors, Mr. Rouhana, Ms. Newmark, and the CSS Entities are collectively referred to as the “Defendants”) Motions to Dismiss (the “Motions”).

**PLEASE TAKE FURTHER NOTICE** that the following papers have been filed in connection with the Motions.

<b>TAB</b>	<b>BRIEFING AND OTHER PAPERS</b>	<b>D.I. NO.</b>
1.	Order Approving Stipulated Scheduling Order	<a href="#"><u>24</u></a>
2.	Motion of the Independent Directors to Dismiss Adversary Complaint	<a href="#"><u>31</u></a>
3.	Order Granting Amended Motion of Defendants William J. Rouhana, Jr., Amy L. Newmark, Chicken Soup for the Soul, LLC, Chicken Soup for the Soul Productions, LLC and Chicken Soup for the Soul Holdings, LLC for Leave to Exceed the Page Limit Requirement for Movant’s Respective Memorandum of Law in Support of Motion to Dismiss Plaintiff’s Complaint	<a href="#"><u>32</u></a>
4.	Defendant Amanda R. Edwards’ Motion to Dismiss Plaintiff’s Complaint	<a href="#"><u>33</u></a>
5.	Opening Brief in Support of Defendant Amanda R. Edwards’ Motion to Dismiss Plaintiff’s Complaint	<a href="#"><u>34</u></a>
6.	The Independent Directors’ Opening Brief in Support of Motion to Dismiss Adversary Case	<a href="#"><u>35</u></a>
7.	Defendant William J. Rouhana, Jr.’s Motion to Dismiss Plaintiff’s Complaint	<a href="#"><u>36</u></a>
8.	William J. Rouhana, Jr.’s Memorandum in Support of Motion to Dismiss Complaint	<a href="#"><u>37</u></a>
9.	Defendant Amy L. Newmark’s Motion to Dismiss Plaintiff’s Complaint	<a href="#"><u>38</u></a>
10.	Amy L. Newmark’s Memorandum in Support of Motion to Dismiss Complaint	<a href="#"><u>39</u></a>

11.	Defendants Chicken Soup for the Soul, LLC, Chicken Soup for the Soul Productions, LLC, and Chicken Soup for the Soul Holdings, LLC's Motion to Dismiss Plaintiff's Complaint	<a href="#"><u>40</u></a>
12.	Chicken Soup for the Soul, LLC, Chicken Soup for the Soul Productions, LLC, and Chicken Soup for the Soul Holdings, LLC's Memorandum in Support of Motion to Dismiss Plaintiff's Complaint	<a href="#"><u>41</u></a>
13.	Appendix of Exhibits in Support of Defendants William J. Rouhana, Jr., Amy L. Newmark and Chicken Soup for the Soul, LLC, Chicken Soup for the Soul Productions, LLC, and Chicken Soup for the Soul Holdings, LLC's Respective Memorandum in Support of Motion to Dismiss Plaintiff's Complaint	<a href="#"><u>42</u></a>
14.	Defendant Jason Meier's Motion to Dismiss Adversary Complaint and Joinder	<a href="#"><u>43</u></a>
15.	Defendant Jason Meier's Opening Brief in Support of His Motion to Dismiss Adversary Complaint and Joinder	<a href="#"><u>44</u></a>
16.	Christopher Mitchell's Motion to Dismiss the Complaint	<a href="#"><u>45</u></a>
17.	Christopher Mitchell's Opening Brief in Support of His Motion to Dismiss the Complaint	<a href="#"><u>46</u></a>
18.	Declaration of Douglas P. Baumstein in Support of Christopher Mitchell's Motion to Dismiss the Complaint and attached exhibits	<a href="#"><u>47</u></a>
19.	Order Approving Stipulated Scheduling Order	<a href="#"><u>50</u></a>
20.	Trustee's Omnibus Responsive Brief I in Opposition to Defendant's Motions to Dismiss the Trustee's Complaint for (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Nonpayment of Employee Wages, Benefits, and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims	<a href="#"><u>51</u></a>
21.	Trustee's Omnibus Responsive Brief II in Opposition to Defendant's Motions to Dismiss the Trustee's Complaint for (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Nonpayment of Employee Wages, Benefits, and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims	<a href="#"><u>52</u></a>
22.	Reply Brief in Further Support of Defendant Amanda R. Edwards' Motion to Dismiss Plaintiff's Complaint	<a href="#"><u>55</u></a>

23.	The Independent Directors' Reply Brief in Support of Motion to Dismiss Adversary Complaint	<a href="#"><u>56</u></a>
24.	Defendant Jason Meier's Reply Brief in Support of His Motion to Dismiss Adversary Complaint and Joinder	<a href="#"><u>57</u></a>
25.	Independent Directors' Request for Oral Argument	<a href="#"><u>58</u></a>
26.	Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, and Chicken Soup for the Soul Holdings, LLC's Reply in Support of Motion to Dismiss Complaint	<a href="#"><u>59</u></a>
27.	William J. Rouhana, Jr.'s and Amy Newmark's Reply in Support of Motion to Dismiss Complaint	<a href="#"><u>60</u></a>
28.	Christopher Mitchell's Reply Brief in Support of His Motion to Dismiss the Complaint	<a href="#"><u>61</u></a>
29.	Supplemental Declaration of Douglas P. Baumstein in Further Support of Christopher Mitchell's Motion to Dismiss the Complaint and attached exhibits	<a href="#"><u>62</u></a>
30.	Defendant Amanda R. Edwards' Request for Oral Argument	<a href="#"><u>64</u></a>
31.	Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, and Chicken Soup for the Soul Holdings, LLC's, William J. Rouhana, Jr., Amy L. Newmark, Christopher Mitchell and Jason Meier's Request for Oral Argument	<a href="#"><u>65</u></a>

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Del. Bankr. L.R. 7007-4, an electronic binder containing copies of this Notice of Completion of Briefing and the papers identified will be delivered to the Chambers of The Honorable Mary F. Walrath .

*[Signature Pages to Follow]*

Dated: October 1, 2025

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